

271 Wolfner Drive ■ Saint Louis, Missouri 63026  
314/349-8399 ■ Fax 314/349-8384

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APR 21 1995  
RCOM SECTION

April 17, 1995

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Ruben McCullers  
USEPA, Region VII  
WSTM/RCRA/RCOM  
726 Minnesota Avenue  
Kansas City, KS 66101

Re: The Knapheide Mfg. Co.  
West Quincy, Missouri  
Waste Paint Filters and Over Spray Paper Storage Unit and Brule Incinerator Unit  
Sample Activity Notification

Dear Mr. McCullers:

This correspondence has been prepared to confirm our April 6, 1995 conversation concerning the prior notification of sampling activities involving the Waste Paint Filters and Over Spray Paper Storage Unit and Brule Incinerator Unit at The Knapheide Mfg. Co. facility located in West Quincy, Missouri. As required under 10(c) of the Consent Order, a written notification must be submitted to the United States Environmental Protection Agency (USEPA) and the Missouri Department of Natural Resources (MDNR) indicating sampling dates at least 30 days prior to each sampling activity. A subsequent letter dated March 15, 1994 from the MDNR to The Knapheide Mfg. Co. reduced this notification time period to 15 days. Section 1.2 (Page 3) of the July 1, 1994 closure plan (approved by the MDNR on August 22, 1994 with modifications) reflected the 15-day notification period.

According to our April 6, 1995 discussion, you have waived the 30-day/15-day notification requirement. As you indicated, on activities such as this one, the USEPA does not require any notification. This is due to the fact that the two (2) RCRA units are under MDNR lead rather than USEPA lead. An April 6, 1995 discussion with Mr. Doug Allen of the MDNR subsequently waived this notification period for a sampling event involving the Waste Paint Filters and Over Spray Paper Storage Unit which occurred on April 10, 1995. Mr. Doug Allen of the MDNR has been kept informed regarding the status of all completed and outstanding closure activities involving the two (2) units.



A SUBSIDIARY OF PERMA-FIX ENVIRONMENTAL SERVICES, INC.

RCRA FILE COPY



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RCRA Records Center

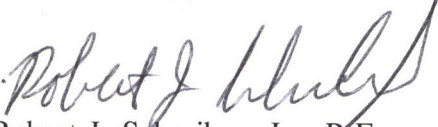
Mr. McCullers  
April 6, 1995  
Page 2

You also indicated during our discussion that, as to work involving sampling adjacent to storage tanks and other related work, the USEPA would remain the lead agency, and thus would require a 30-day advance notice prior to conducting any such sampling, unless the USEPA waives such required notice in any specific instance.

Please review this correspondence at your earliest convenience. If you have any questions regarding the information presented herein, contact Mr. Allen L. Steinkamp of my staff at (314) 349-8399. It will be assumed that there are no discrepancies with the contents of this letter if we do not hear from you within 15 days of receipt of this letter.

Sincerely,

SCHREIBER, GRANA & YONLEY, INC.

  
Robert J. Schreiber, Jr., P.E.  
President

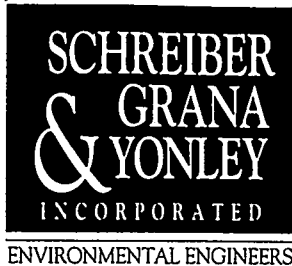
RJS/als/ccp

Enclosures

cc: Mr. Doug Allen - MDNR  
Mr. Gerry Korb - The Knapheide Mfg. Co.  
Mr. Harold D. Huggins - The Knapheide Mfg. Co.  
Ms. Sandra L. Oberkfell - Rudnick & Wolfe

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April 17, 1995

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Doug Allen  
Missouri Department of Natural Resources  
Department of Environmental Quality, Hazardous Waste Program  
P.O. Box 176  
Jefferson City, MO 65102-0176

Re: The Knapheide Mfg. Co.  
West Quincy, Missouri  
Waste Paint Filters and Over Spray Paper Storage Unit and Brule Incinerator Unit  
Sample Activity Notification

Dear Mr. Allen:

This correspondence has been prepared to confirm our April 6, 1995 conversation concerning the prior notification of sampling activities involving the Waste Paint Filters and Over Spray Paper Storage Unit and Brule Incinerator Unit at The Knapheide Mfg. Co. facility located in West Quincy, Missouri. As required under 10(c) of the Federal Consent Order, a written notification must be submitted to the United States Environmental Protection Agency (USEPA) and the Missouri Department of Natural Resources (MDNR) indicating sampling dates at least 30 days prior to each sampling activity. A subsequent letter dated March 15, 1994 from the MDNR to The Knapheide Mfg. Co. reduced this notification time period to 15 days. Section 1.2 (Page 3) of the July 1, 1994 closure plan (approved by the MDNR on August 22, 1994 with modifications) reflected the 15-day notification period.

According to our April 6, 1995 discussion, you have waived the 30-day/15-day notification requirement. As you indicated, our discussion served as sufficient notification for the MDNR. According to an April 6, 1995 conversation with Mr. Ruben McCullers of the USEPA, the USEPA has also waived such notification, as the two (2) RCRA units are under MDNR lead rather than USEPA lead. You also waived the notice requirement as to the Waste Paint Filters and Over Spray Paper Storage Unit sampling event which occurred on April 10, 1995. Details regarding this sampling event were included in the February 8, 1995 letter to you.

The results of this sampling event are expected to be received in approximately three (3) weeks, i.e., May 1, 1995. At that point in time, it is expected that all outstanding issues involving the Brule Incinerator Unit will be resolved and subsequent equipment/concrete dismantling and disposal can occur. Specifically, the contract between The Knapheide Mfg. Co. and the



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receiving landfill facility, owned and operated by Laidlaw Environmental Services (Laidlaw), should be received early next week. The Brule Unit waste stream was accepted on March 13, 1995 by Laidlaw. The authorization number is LM95-0156.

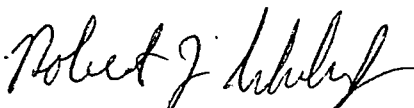
Any additional soil sampling which may be deemed appropriate based on the analytical results of the April 10, 1995 sampling event can also be scheduled and sampled at the same time as that of the Brule Unit equipment/concrete dismantling, transportation and disposal. Consequently, per our April 6, 1995 discussion, this letter is also intended to serve as the 30-day/15-day notification of any such potential sampling activity(ies). Actual dates for the above activity(ies) will be provided to you by phone as such are identified.

As you stated during our March 27, 1995 conversation, the MDNR does not require additional sample event protocol approval, but rather requires a continued good faith effort to fully delineate the areas of impacted soil, ultimately leading to the closure of both units; however, to maintain open communications between The Knapheide Mfg. Co. and the MDNR, the results of the April 10, 1995 sampling event will be conveyed to you as they become available. Any resultant data which may conflict with other associated on-site environmental activities will be brought to your attention.

Please review this correspondence at your earliest convenience. If you have any questions regarding the information presented herein, contact Mr. Allen L. Steinkamp of my staff at (314) 349-8399. We are proceeding promptly, but we would appreciate a written confirmation of MDNR's position regarding the issue of sampling activity notification as soon as possible.

Sincerely,

SCHREIBER, GRANA & YONLEY, INC.

  
Robert J. Schreiber, Jr., P.E.  
President

RJS/als/ccp

Enclosures

cc: Mr. Ruben McCullers - USEPA  
Mr. Gerry Korb - The Knapheide Mfg. Co.  
Mr. Harold D. Huggins - The Knapheide Mfg. Co.  
Ms. Sandra L. Oberkfell - Rudnick & Wolfe

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SCHREIBER, GRANA & YONLEY, INC.

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